## GORDON & REES LLP

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## MEMO ENDORSED

December 12, 2019

## Via ECF

The Honorable Edgardo Ramos United States District Court Southern District of New York 500 Pearl Street New York, NY 10007 USDC SDNY
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DATE FILED: December 13, 2019

Re: Caroline M. Catz v. Precision Global Consulting et al.

Civil Action File No. 1:19-CV-07499 (ER)

Dear Judge Ramos,

This firm represents Defendant Precision Global Consulting ("PGC") in the above-referenced matter. In compliance with Rule 1(E) of Your Honor's Individual Practices, we write with the consent of all parties, including Plaintiff Caroline Catz, to respectfully request an adjournment to the pre-motion conference scheduled for December 17, 2019 at 10:15 a.m. This is PGC's first adjournment request, and it will not affect any other dates in this matter.

The reason for this request is that the undersigned has a conflicting conference in an unrelated matter at 10:00 a.m. on December 17, 2019 in the Southern District of New York in White Plains. That conference, in the case captioned as *Domingues v. Barton Chevrolet Cadillac et al*; Case No. 7:18-CV-7772 (KMK), was scheduled by the Honorable Judge Karas on November 29, 2019. (*See Domingues v. Barton Chevrolet Cadillac et al*; Case No. 7:18-CV-07772 (KMK) at Dkt. No. 29.)

The parties conferred and here offer alternative dates for the conference in this matter, as follows: the afternoon of January 3, 2020, any time January 8, 2020 – January 10, 2020, or a date more convenient for Your Honor. Please note that the parties discussed a conference date for December 18, 2019 and December 23, 2019, but were not all available on those dates. Thank you for your attention to this matter.

Respectfully submitted, GORDON & REES, LLP

/s/Jeremi L. Chylinski

Jeremi L. Chylinski

The pre-motion conference scheduled for December 17, 2019 at 10:15 AM is hereby adjourned to January 8, 2020 at 2:30 PM. The Clerk of Court is respectfully directed to terminate letter motion, Doc. 20.

Edgardo Ramos, U.S.D.J

Dated: December 13, 2019 New York, New York

cc: all parties via ECF

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